January 15, 2010

486.001.07.002

U.S. Environmental Protection Agency Region IX75 Hawthorne StreetSan Francisco, CA 94105

Attention: Ms. Sharon Lin

DREDGING PILOT STUDY WORK PLAN
BERTH B – LEVIN-RICHMOND TERMINAL CORPORATION
LAURITZEN CHANNEL
RICHMOND, CALIFORNIA

Dear Ms. Lin:

Per a request in your May 14, 2009 letter to Mr. Gary Levin of Levin Enterprises, please find enclosed a work plan outline for a dredging pilot study proposed at Berth B of the Levin-Richmond Terminal Corporation facility on the Lauritzen Channel in Richmond, Califorina.

This outline provides a description of the components of the pilot study work plan and allows for EPA's review and concurrence with the structure and focus of the work plan prior to preparation of the document. Once concurrence is reached between all parties, PES will begin preparation of the work plan document for your review.

We look forward to working with you on this project. Please call either of the undersigned if you have any questions.

Very truly yours,

PES ENVIRONMENTAL, INC.

James P. Dunn, R.G.

Associate Geologist

William F. Frizzell, P.E.

Principal Engineer

Attachment: Pilot Study Work Plan Outline

cc: Mr Gary Levin, Levin Enterprises

Keith Howard Esq., Cooper, White & Cooper

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PES Environmental, Inc.

ATTACHMENT

WORK PLAN OUTLINE BERTH B PILOT STUDY LAURITZEN CHANNEL RICHMOND, CALIFORNIA

1.0 INTRODUCTION

1.1 Introduction to Project

Pilot study introduction including purpose of study, project owner and environmental consultant identification and project location information.

1.2 Organization of Work Plan

Organization of work plan document.

1.3 Regulatory Agency Status

Regulatory agency identification, correspondence and approvals related the dredging pilot study.

1.4 Lauritzen Channel Project Overview

Brief summary of Lauritzen Channel superfund project.

1.5 List of Acronyms

2.0 PILOT STUDY OBJECTIVES AND PARAMETERS

2.1 Objectives of the Dredging Pilot Study

Presentation of objectives of the dredging pilot study.

2.2 Study Area and Anticipated Sediment Volumes;

Identification of study area using graphical plan and cross-sectional views to present anticipated sediment volumes.

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2.3 Dredge Material Evaluation

2.3.1 Pre-Study Sediment and Oversize Material Evaluation

Results of a pre-pilot study sediment sampling and oversize material evaluation including information on sampling locations and methodologies, procedures for evaluating the presence of oversized materials within the area slated for dredging and the results of physical and chemical testing.

2.3.2 Bench-Scale Dewatering Study

Results of a bench-scale dewatering study conducted on the anticipated dredge spoils evaluating the design parameters for dewatering system. Selection of appropriate polymers to be used during the dewater process will also be presented.

2.4 Slope Stability Evaluation

Assessment of slope stability conditions before and anticipated after completion of pilot study dredging operations.

3.0 PILOT STUDY SYSTEM DESIGN AND IMPLEMENTATION

3.1 Sediment Dredging

Design and operation parameters of the crane-mounted low turbidity dredge pump and spoil conveyance system.

3.2 Dredge Spoil Dewatering

Design of proposed dewatering system including dewatering area preparation, geotube design and estimates of operational rates and wastewater volumes.

3.3 Wastewater Management and Disposal

Design of proposed wastewater management system including containment vessel design and location as well as parameters for discharge to the City of Richmond Sanitary District system.

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3.4 Dredge Spoil Management and Disposal

Information regarding dredge spoil management including waste characterization, waste disposal landfill profiling and acceptance, manifesting procedures and traffic-related planning.

3.5 Pilot Study Implementation Plan

Details of the implementation plan for completion of the pilot study. Includes protocols and procedures that will be following during each phase of the study from dredging operations to spoils off-site transportation and disposal to post-study cleanup and decontamination.

4.0 ENVIRONMENTAL MONITORING

4.1 Environmental Monitoring Objectives

Objectives for environmental monitoring during the pilot study including turbidity testing within the water column at selected locations downstream and upstream of the Lauritzen Canal.

4.2 Monitoring Protocols and Procedures

Protocols and procedures to be followed as part of the environmental monitoring program. Will include type and frequency of environmental sampling to be conducted during the pilot study.

5.0 REPORTING

Description of the report deliverables that will be prepared at the termination of the pilot study.

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APPENDICIES

Project-Specific Health & Safety Plan

Safety policies and procedures that will be followed during the pilot study to provide worker protection and minimize exposure to residual pesticides present in the pilot study area.

Quality Assurance/Quality Control Plan

Quality assurance and quality control procedures to be followed during process and environmental sampling during the pilot study.